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Federal Defenders OF NEW YORK, INC. Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

Barry D. Leiwant Interim Executive Director and Attorney-in-Chief Southern District of New York Jennifer L. Brown Attorney-in-Charge

April 18, 2024

BY ECF

Hon. Lewis A. Kaplan United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: <u>United States v. Kahron Robinson</u> 23 Cr. 665 (LAK)

Dear Judge Kaplan,

Kahron Robinson, through undersigned counsel, respectfully requests a bail modification to permit him to attend a boxing match with his father on Saturday, April 20.

Mr. Robinson was released on September 29th, 2023, on a \$50,000 Personal Recognizance Bond, that was co-signed by two financially responsible persons, with travel restricted to the Southern and Eastern districts of New York and supervision under Pre-Trial Services. His conditions were modified on October 26, 2023, to include home detention enforced by location monitoring. Mr. Robinson has previously been given permission to spend the holidays at his maternal grandmother's home. He was completely compliant with the schedule set by the Court and enforced by Pretrial.

Mr. Robinson requests permission to attend a boxing event with his father on April 20, 2024. Mr. Robinson's father is visiting New York from Virginia and is hoping to spend the evening with his son attending the boxing event. The boxing event will take place at the Barclays Center in Brooklyn. Doors open at 4:30 PM and the event is scheduled to run until 12:00 AM. I request that Mr. Robinson be permitted to leave his home on April 20 at 3:00 PM and return after the match ends by 1:00 AM EST.

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Pretrial takes no position on Mr. Robinson's request as long as court approval is granted. The Government defers to Pretrial.

Respectfully submitted,

/s/ Zawadi Baharanyi Zawadi Baharanyi

Assistant Federal Defenders
Federal Defenders of New York
(212) 417-8735

cc: AUSA Emily Deininger

USPSO Dominique Jackson

SO ORDERED:

HONORABLE LEWIS A. KAPLAN

United States District Judge

4/19/24